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8
9 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
10 **SAN FRANCISCO DIVISION**

11
12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
20 ☒ Affects both Debtors

* All papers shall be filed in the Lead Case, No.
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF JANE KIM IN
SUPPORT OF REORGANIZED DEBTORS'
NINETY-THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LEGAL LIABILITY CLAIMS)**

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tel./Video Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Jane Kim, pursuant to section 1746 of title 28 of the United States Code, hereby declare under
2 penalty of perjury that the following is true and correct to the best of my knowledge, information, and
3 belief:

4 1. I am a partner of Keller Benvenuti Kim LLP, counsel to PG&E Corporation (“**PG&E**
5 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
6 (collectively, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned chapter 11 cases (the
7 “**Chapter 11 Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ Ninety-Third*
8 *Omnibus Objection to Claims (No Legal Liability Claims)* [Docket No. 10808] (the “**Omnibus**
9 **Objection**”),¹ with respect to the claims of Darwin Richards (Claim Nos. 86933 and 96962)
10 (collectively, the “**Richards Claims**”).

11 2. On July 13, 2021, I printed out a copy of the full docket for the appeal titled *Symmetry*
12 *Device Research, Inc., et al. v. City of Richmond, et al.*, Case No. A127960 (the “**Richards Appeal**”),
13 in the Court of Appeal of the State of California, First Appellate District (the “**Court of Appeal**”) from
14 the Court of Appeal’s website at <https://appellatecases.courtinfo.ca.gov/>. The Richards Appeal was of
15 the Superior Court Order, brought by Mr. Richards and SDRI on March 22, 2010, as described in the
16 Reply. As noted on the docket sheet, the Court of Appeal marked the Richards Appeal as complete
17 following the denial by the Supreme Court of California of Mr. Richards’s and SDRI’s petition for
18 review on February 16, 2011. Attached as **Exhibit A** is a true and correct copy of the printout of the full
19 docket of the Richards Appeal as of July 13, 2021.

20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
21 correct to the best of my knowledge, information, and belief. Executed this twenty-first day of July,
22 2021, in Millbrae, California.

23 /s/ Jane Kim
24 Jane Kim

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26
27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
28 the *Reply in Support of Reorganized Debtors’ Ninety-Third Omnibus Objection to Claims*, filed
contemporaneously herewith (the “**Reply**”).